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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
FELIX REYES-GODINEZ,  
AKA ALEJANDRO OROZCO-OCHOA,  
AKA ANTONIO REYES,  
AKA FELIX GODINEZ-REYES,  
AKA FELIX HERNANDEZ,  
AKA DAVID RODRIGUEZ-MENDEZ,  
  
Defendant.

CASE NO. 1:25-CR-00035-JLT-SKO

STIPULATION AD ORDER REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT

DATE: APRIL 2, 2025  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on April 2, 2025.
2. By this stipulation, defendant now moves to continue the status conference until June 4, 2025, and to exclude time between April 2, 2025, and June 4, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes reports, the Defendant's criminal history, and the Defendant's immigration record. All of this discovery has been either produced directly to counsel and/or made available for

inspection and copying.

b) Counsel for defendant desires additional time to consult with her client, to review the current charges, conduct investigation, and discuss potential resolutions with her client.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of April 2, 2025 to June 4, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 26, 2025

MICHELE BECKWITH  
Acting United States Attorney

/s/ CALVIN LEE  
CALVIN LEE  
Assistant United States Attorney

1 Dated: March 26, 2025

/s/ Christina M. Corcoran

Christina M. Corcoran

Counsel for Defendant

FELIX REYES-GODINEZ

5 **ORDER**

6 IT IS SO ORDERED.

9  
10 DATED: 3/26/2025

*Sheila K. Oberto*

THE HONORABLE SHEILA K. OBERTO

UNITED STATES DISTRICT JUDGE